

EXHIBIT A

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Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF TEXAS
3 MARSHALL DIVISION

4
5 ENTROPIC COMMUNICATIONS,)
6 LLC,)
7)
8)
9 Plaintiff,)
10)
11)
12 vs.)Civil Action No.
13)
14)
15 CHARTER COMMUNICATIONS,)
16 INC.,)
17)
18)
19 Defendant.)
20)
21
22
23
24
25

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16 VIDEO-RECORDED 30(b)(6) DEPOSITION

17 OF CHARTER COMMUNICATIONS, INC.

18 BY

19 ROGER GRAHAM STAFFORD

20 LONE TREE, COLORADO

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		Page 2		Page 4
1	APPEARANCES		1	Stafford PMA Downstream EFA 119
2			2	Exhibit 9
3			3	Stafford Spreadsheet 139
4	For Plaintiff: K&L GATES LLP		4	Exhibit 10
5	By: Nicholas Lenning, Esq.		5	Stafford PMA Improvements - Strategies 143
6	925 Fourth Avenue		6	Exhibit 11 Employed for Faster
7	Suite 2900		7	Mitigation, Increased
8	Seattle, WA 98104		8	Capacity, and Cost Savings
9	(206) 623-7580		9	Stafford Full Scale Employment of PMA 144
10	nicholas.lenning@klgates.com		10	Exhibit 12
11	K&L GATES LLP		11	Stafford Spreadsheet 160
12	By: Samuel P. Richey, Esq.		12	Exhibit 13
13	70 W. Madison Street		13	Stafford Representative Cable FBD 165
14	Suite 3300		14	Exhibit 14
15	Chicago, IL 60602		15	Stafford Data Over Cable Service 167
16	(312) 372-1121		16	Exhibit 15 Interface Specification
17	samuel.richey@klgates.com		17	12 Proactive Network Maintenance
18	For Defendant: ARNOLD & PORTER		18	13 Stafford PNM Technical Roadmap 169
19	By: Daniel L. Reisner, Esq.		19	Exhibit 16
20	250 West 55th Street		20	14 Stafford Network Monitoring Where and 171
21	New York, NY 10019		21	15 Exhibit 17 How to Monitor a Cable Network
22	(212) 836-8132		22	16 Stafford A Comprehensive Case Study of 173
23	daniel.reisner@arnoldporter.com		23	Exhibit 18 Proactive Network Maintenance
24	Also Present: Davis Baumunk, Videographer		24	17 Stafford Tech Talk: DOCSIS3.1 What it 175
25	Daniel Boglioli, Charter		25	18 Exhibit 19 means to Charter
	Communications			19 Communications
				19 Stafford In-Home Topologies as a limit 178
				20 Exhibit 20 to Network Capacity Expansion
				21
				22
				23
				24
				25
		Page 3		Page 5
1	INDEX		1	PURSUANT TO WRITTEN NOTICE and the
2			2	appropriate rules of civil procedure, the Video
3	EXAMINATIONS:	PAGE	3	3 Deposition of ROGER GRAHAM STAFFORD, called for
4	ROGER GRAHAM STAFFORD		4	4 examination by the Plaintiff, was taken at Denver
5	Examination By Mr. Lenning	7	5	5 Marriott South at Park Meadows, 10345 Park Meadows
6	Examination By Mr. Reisner	184	6	6 Drive, Lone Tree, CO 80124, commencing at 9:13 AM on
7			7	7 Tuesday, June 27, 2023, before Jennifer L. Smith,
8	EXHIBITS		8	8 California CSR No. 10358, Washington CCR No. 3101,
9			9	9 RMR, CRR, CRC, and Notary Public in and for the State
10	No. Description Identified		10	10 of Colorado.
11	Stafford Notice of Deposition of 16		11	
12	Exhibit 1 Charter Communications, Inc.		12	
13	Pursuant to FED. R. CIV. P.		13	
14	30(b)(6)		14	
15	Stafford Plaintiff's Amended Notice of 19		15	
16	Exhibit 2 Deposition of Roger Stafford		16	
17	Stafford Roger Stafford LinkedIn 19		17	
18	Exhibit 3 Profile		18	
19	Stafford Document Produced In Native 36		19	
20	Exhibit 4 Format - DOCSIS 3.1 Profile		20	
21	Management Application (PMA)		21	
22	Stafford PMA Technical Roadmap & Status 54		22	
23	Exhibit 5 Downstream Profile Management 63		23	
24	Stafford Exhibit 6 Application (PMA) Pilot		24	
25	Deployment		25	
	Stafford Profile Management Application 107			
	Exhibit 7			
	Stafford DOCSIS and DAA Infrastructure 116			
	Exhibit 8			

2 (Pages 2 - 5)

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Page 6	Page 8
1 PROCEEDINGS	1 witness not to reveal any information that you 09:15:56
2	2 learned as a result of communications with counsel. 09:16:00
3 THE VIDEOGRAPHER: Good morning. We are 09:13:51	3 To the extent you know anything about the 09:16:03
4 going on the record at 9:13 on June 27, 2023. 09:13:52	4 case, apart from communications with counsel, you may 09:16:04
5 Audio and video recording will continue to 09:13:57	5 answer. 09:16:07
6 take place unless all parties agree to go off the 09:13:59	6 THE WITNESS: I just remember it was a -- a 09:16:14
7 record. 09:14:02	7 MoCA-related case. 09:16:18
8 This is Media Unit 1 of the video-recorded 09:14:02	8 BY MR. LENNING: 09:16:18
9 deposition of Roger Stafford, taken by counsel for 09:14:07	9 Q. Why were you testifying? 09:16:22
10 plaintiff, in the matter of Entropic Communications, 09:14:10	10 MR. REISNER: Same instructions. 09:16:26
11 LLC, versus Charter Communications, LLC, filed in the 09:14:14	11 THE WITNESS: It was a personal deposition 09:16:30
12 United States District Court for the Eastern District 09:14:20	12 as a Charter employee. 09:16:32
13 of Texas, Marshall Division, Case Number 09:14:23	13 BY MR. LENNING: 09:16:32
14 2:22-cv-00125-JRG. 09:14:25	14 Q. Do you know the name of that case? 09:16:37
15 The location of this deposition is 09:14:30	15 A. No, I don't remember. 09:16:40
16 10345 Park Meadows Drive, Lone Tree, Colorado. 09:14:35	16 Q. Do you remember any of the parties? Aside 09:16:42
17 My name is Davis Baumunk, representing 09:14:41	17 from Charter, I assume? 09:16:45
18 Veritext Legal Solutions, and I am the videographer. 09:14:44	18 A. No, I don't. 09:16:49
19 The court reporter is Jennifer Smith from the firm 09:14:46	19 Q. Have you ever testified in court before? 09:16:55
20 Veritext Legal Solutions. 09:14:50	20 A. No, No, I've not. 09:17:00
21 I am not related to any party in this 09:14:51	21 Q. Okay. I'm going to go over some ground 09:17:04
22 action, nor am I financially interested in the 09:14:54	22 rules for the deposition, a lot of which may sound 09:17:08
23 outcome. 09:14:55	23 familiar from the first time you were deposed, but 09:17:11
24 Counsel will now state their appearances and 09:14:57	24 we're going to go over them just so we're all on the 09:17:13
25 affiliations for the record, beginning with the 09:14:59	25 same page about how we're going to proceed. 09:17:15
Page 7	Page 9
1 noticing attorney. 09:15:01	1 You understand that your testimony here 09:17:17
2 MR. LENNING: Nick Lenning with K&L Gates 09:15:03	2 today is under oath? 09:17:19
3 for the plaintiff, and with me is Pat Richey, also of 09:15:09	3 A. Yes, I do. 09:17:21
4 K&L Gates. 09:15:12	4 Q. And you understand that your answers, 09:17:23
5 MR. REISNER: Dan Reisner, Arnold & Porter, 09:15:14	5 therefore, are subject to the penalties of perjury? 09:17:25
6 for the defendant and witness. I'm here with 09:15:14	6 A. Yes, I do. 09:17:28
7 in-house counsel for Charter, Dan Boglioli. 09:15:16	7 Q. Since the court reporter is transcribing 09:17:29
8 09:15:30	8 your testimony, please say yes or no in response to 09:17:32
9 ROGER GRAHAM STAFFORD, 09:15:30	9 questions, rather than uh-huh or nodding your head. 09:17:36
10 having been first duly sworn, 09:15:30	10 Is that fair? 09:17:39
11 was examined and testified as follows: 09:15:30	11 A. Understood. 09:17:43
12 09:15:31	12 Q. I'd also ask you to wait until I finish my 09:17:44
13 EXAMINATION 09:15:31	13 question before you answer it. That way the court 09:17:47
14 BY MR. LENNING: 09:15:31	14 reporter will be able to transcribe both the 09:17:49
15 Q. Good morning. Could you state your full 09:15:32	15 questions and the answers, and we'll have a clear 09:17:52
16 name for the record and spell it. 09:15:35	16 transcript. 09:17:54
17 A. Yes. Roger, R-o-g-e-r, Graham, G-r-a-h-a-m, 09:15:37	17 Is that fair? 09:17:55
18 Stafford, S-t-a-f-f-o-r-d. 09:15:43	18 A. Yes. 09:17:55
19 Q. Have you ever had your deposition taken 09:15:47	19 Q. And by that same token, if I interrupt you 09:17:56
20 before? 09:15:48	20 before you've finished your answer, just let me know 09:17:58
21 A. Yes. 09:15:49	21 so you can finish. 09:18:00
22 Q. How many times? 09:15:50	22 A. Understood. 09:18:02
23 A. Once. 09:15:51	23 Q. If at any time you feel like you need a 09:18:04
24 Q. And what was that for? 09:15:53	24 break, just let me know. The only limitation to that 09:18:07
25 MR. REISNER: I'm just going to caution the 09:15:55	25 is that, if there is a question pending, I'd ask you 09:18:10

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Page 10	Page 12
1 to answer that question before we take a break. 09:18:13	1 MR. REISNER: You can answer to the extent 09:20:10
2 Do you understand? 09:18:15	2 that you need to rely on information that you learned 09:20:14
3 A. Understood. 09:18:16	3 as a result of reviewing those documents with respect 09:20:19
4 Q. If any of my questions are unclear or if you 09:18:18	4 to PMA, which you're designated on to testify on 09:20:24
5 don't understand them, please let me know, and I'll 09:18:21	5 behalf of Charter. 09:20:26
6 try to restate the question. 09:18:24	6 I'm not sure if you -- based on your looking 09:20:31
7 Is that clear? 09:18:25	7 at me, I'm not sure if you understand my instruction. 09:20:33
8 A. Yes. 09:18:26	8 So let me try to clarify. 09:20:36
9 Q. And if you answer my question, I'm going to 09:18:28	9 We object to asking for a list of the 09:20:37
10 assume that you understood it. 09:18:31	10 documents that Mr. Stafford was shown by counsel. 09:20:41
11 Agreed? 09:18:33	11 That's work product. 09:20:45
12 A. Understood. 09:18:34	12 But to the extent that the witness's 09:20:46
13 Q. During the deposition, as already happened, 09:18:37	13 testimony on behalf of the company, which is with 09:20:50
14 your counsel may state an objection after I ask a 09:18:41	14 respect to PMA and on the other topics that I 09:20:55
15 question. Those objections are simply to make a 09:18:44	15 identified in my email yesterday, to the extent you 09:20:59
16 record so the judge can rule on objections at a later 09:18:47	16 are relying on information that you learned from the 09:21:03
17 time. 09:18:50	17 documents in order to testify on behalf of Charter, 09:21:05
18 If your counsel objects, you still must 09:18:50	18 you can answer. 09:21:09
19 answer the question unless your counsel specifically 09:18:53	19 It may require some follow-up from you to 09:21:11
20 instructs you not to answer and you decide to follow 09:18:56	20 make sure the witness understands what you're asking 09:21:13
21 your counsel's instruction. 09:19:00	21 for, but we have an objection. 09:21:15
22 Do you understand that? 09:19:02	22 THE WITNESS: Could you repeat the question, 09:21:20
23 A. Understood. 09:19:03	23 please? 09:21:21
24 Q. Is there any reason you cannot provide 09:19:04	24 BY MR. LENNING: 09:21:21
25 truthful or accurate testimony today? 09:19:06	25 Q. Yeah. 09:21:22
Page 11	Page 13
1 A. No. 09:19:08	1 The question is what documents you looked at 09:21:22
2 Q. I want to ask you about your preparation for 09:19:12	2 to prepare for today? 09:21:24
3 today's deposition. 09:19:14	3 MR. REISNER: Same -- same instruction; same 09:21:28
4 You are represented here by counsel today? 09:19:16	4 objection. 09:21:30
5 A. Yes, I am. 09:19:20	5 So I'm concerned that the witness is not 09:21:35
6 Q. And what did you do to prepare for your 09:19:21	6 understanding my objection, and I suggest that either 09:21:37
7 deposition today? 09:19:23	7 we can take a break, if this is what you want to 09:21:43
8 A. I met with counsel yesterday. 09:19:24	8 pursue, or you can ask, you know, more precise 09:21:46
9 Q. The same counsel that's in the room? 09:19:29	9 questions on this, as, you know, other -- other 09:21:48
10 A. Yes. 09:19:31	10 counsel from Entropic have done with prior witnesses. 09:21:53
11 Q. Did you meet with anyone else? 09:19:32	11 BY MR. LENNING: 09:21:53
12 A. No. 09:19:34	12 Q. Let me ask you this: Did you review -- did 09:22:02
13 Q. Were there any other meetings aside from 09:19:39	13 you do any independent review of documents outside of 09:22:05
14 yesterday? 09:19:41	14 counsel? 09:22:08
15 A. No. 09:19:42	15 A. No. 09:22:09
16 Q. How long was your meeting yesterday? 09:19:45	16 Q. Okay. When you were reviewing documents 09:22:10
17 A. About eight hours. 09:19:46	17 with counsel, was a distinction made between the 09:22:13
18 Q. Did you review any documents to prepare for 09:19:50	18 documents you were prepping for to testify on behalf 09:22:17
19 today? 09:19:56	19 of Charter as a 30(b)(6) witness versus other topics? 09:22:20
20 A. Yes. 09:19:57	20 A. I'm not sure what a 30(b)(6) witness is. 09:22:26
21 Q. Approximately how many hours did you spend 09:19:57	21 Q. Okay. Let's cover that. 09:22:33
22 reviewing documents in preparation for your 09:19:58	22 Have you -- do you understand that you've 09:22:37
23 deposition today? 09:20:00	23 been designated by Charter to testify on behalf of 09:22:39
24 A. About two or three hours. 09:20:03	24 the company on certain topics? 09:22:42
25 Q. What documents did you look at to prepare? 09:20:07	25 A. Yes. Generally, yes. Uh-huh. 09:22:48

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Page 14	Page 16
1 Q. And do you understand what those topics are? 09:22:51	1 Q. And where did you search for documents? 09:26:21
2 A. The subject of Profile Management 09:22:53	2 A. My -- my laptop and some Cloud-based 09:26:24
3 Application -- 09:22:53	3 archives. 09:26:33
4 Q. Okay. 09:23:00	4 Q. Are there any potential sources of documents 09:26:35
5 A. -- is one of those topics. 09:23:01	5 that you did not search? 09:26:37
6 Q. Did you review any documents to prepare to 09:23:02	6 A. No. 09:26:38
7 testify about that? 09:23:05	7 Q. What documents did you find? 09:26:42
8 MR. REISNER: And I'm going to -- same 09:23:06	8 A. They are PowerPoint presentations, .pdfs, 09:26:46
9 caution. So to the extent that you are actually 09:23:07	9 perhaps some Excel spreadsheets relating to this -- 09:26:55
10 relying on information that you learned from 09:23:13	10 the subject matter I was asked to collect 09:27:01
11 reviewing those documents in order to answer 09:23:16	11 documentation on. 09:27:04
12 questions today, you can identify the document. 09:23:19	12 Q. And when was that? 09:27:05
13 But you can't identify the document simply 09:23:22	13 A. Perhaps about two months ago. 09:27:11
14 because I showed it to you and you looked at it. 09:23:25	14 Q. And you didn't review any of those documents 09:27:15
15 THE WITNESS: So my testimony today will be 09:23:29	15 again in the recent past to prepare for this? 09:27:17
16 based on information that I already know as -- from 09:23:32	16 MR. REISNER: Same -- same instructions. 09:27:22
17 my history of working on these subjects. 09:23:36	17 THE WITNESS: No. 09:27:24
18 BY MR. LENNING: 09:23:36	18 MR. LENNING: Counsel, do you want to list 09:27:35
19 Q. Okay. So you did not review any documents 09:23:39	19 the topics that he has been designated on for 09:27:36
20 to be able to testify today on behalf of Charter on 09:23:42	20 Charter? 09:27:40
21 those topics? 09:23:46	21 MR. REISNER: Sure. 09:27:40
22 A. That's correct. 09:23:46	22 MR. LENNING: And we can introduce 09:27:42
23 Q. Did you speak with anyone else to prepare 09:24:12	23 Exhibit 1, if you open it, is the 30(b)(6) notice. 09:27:45
24 for today? 09:24:13	24 We can introduce that exhibit. 09:27:51
25 A. No, I did not. 09:24:15	25 (Stafford Exhibit 1 was identified.) 09:28:08
Page 15	Page 17
1 Q. Can you briefly describe what you know about 09:24:24	1 THE WITNESS: Okay. I can see this 09:28:08
2 this case? 09:24:26	2 document. 09:28:10
3 MR. REISNER: Again, I'm going to caution 09:24:27	3 BY MR. LENNING: 09:28:10
4 you not to reveal any information you learned as a 09:24:29	4 Q. Are you able to open it? 09:28:11
5 result of communications with counsel. 09:24:34	5 A. I am able to open it, yes. 09:28:13
6 So you can answer the questions to the 09:24:35	6 Q. Okay. 09:28:15
7 extent you have knowledge of this case, apart from 09:24:38	7 MR. REISNER: So we're designating as we 09:28:16
8 communications with counsel. 09:24:42	8 communicated with counsel yesterday, Mr. Stafford, 09:28:18
9 THE WITNESS: So I really know very little 09:25:17	9 for every topic, to the extent interpreted to -- to 09:28:25
10 about the case, except for that which I've learned 09:25:21	10 relate to PMA. In addition to, we're designating 09:28:31
11 from counsel. 09:25:25	11 Mr. Stafford on Topic 29 for access engineering, and 09:28:35
12 BY MR. LENNING: 09:25:25	12 we're also designating him on topics 76, 90, 96, and 09:28:40
13 Q. Have you discussed this case with anyone at 09:25:29	13 89 with respect to cable modems, CMTSs, set-top 09:28:48
14 Charter, aside from counsel? 09:25:30	14 boxes, and PMA, and 98 with respect to Mr. Stafford 09:28:53
15 A. No. 09:25:36	15 himself. 09:28:58
16 Q. Did you talk with any of your coworkers 09:25:42	16 BY MR. LENNING: 09:28:58
17 about their depositions in this case? 09:25:43	17 Q. Have you seen this document before? 09:28:59
18 A. No. 09:25:45	18 A. No. 09:29:01
19 Q. Did you search for documents for this 09:25:47	19 Q. The topics that he just listed, have you 09:29:04
20 litigation? 09:25:52	20 read them? 09:29:06
21 A. No. Oh, let me correct that. 09:25:53	21 A. I'm unable to map those numbers that he 09:29:10
22 So I was asked by counsel to provide 09:25:57	22 listed to topics. 09:29:12
23 documentation that I have held or hold that relates 09:26:00	23 Q. What I'm asking you is -- so he just listed 09:29:16
24 to the case. 09:26:10	24 different topics that are in that document, if you 09:29:19
25 So I provided that documentation to counsel. 09:26:12	25 scroll down, and the topics have subject matter. 09:29:22

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Page 18		Page 20	
1 I'm asking have you ever read those before?	09:29:25	1 that.	09:32:37
2 A. Can you tell me where in the document?	09:29:29	2 A. Yes, I see that document now.	09:32:37
3 Q. Yeah. Sure.	09:29:33	3 Q. Is this a true and accurate copy of your	09:32:43
4 If you roll down -- scroll down -- okay.	09:29:33	4 LinkedIn profile?	09:32:44
5 Hold on.	09:29:36	5 A. Yes, it appears to be my LinkedIn profile.	09:33:04
6 So if you scroll down to A8, it's actually	09:29:55	6 Q. Is the information in here accurate?	09:33:07
7 Page 11 in the .pdf.	09:30:00	7 A. Yes, I believe it is.	09:33:22
8 A. A8, yes.	09:30:05	8 Q. Your current position is Principal	09:33:25
9 Q. Uh-huh.	09:30:08	9 Architect III; correct?	09:33:27
10 Do you see there it says Topic 29?	09:30:09	10 A. That's correct.	09:33:30
11 A. Yes.	09:30:12	11 Q. What is that?	09:33:31
12 Q. I believe that's one of the ones your	09:30:12	12 A. It's a role at Charter, one of the standard	09:33:33
13 counsel just listed that you were designated on.	09:30:14	13 titles for an architect within the Network Technology	09:33:43
14 Have you ever read that before?	09:30:16	14 Group that focuses on product development and access	09:33:51
15 A. No, I've not.	09:30:18	15 architecture, design, planning, and execution.	09:33:55
16 Q. So I asked you earlier if you understood	09:30:24	16 Q. Is 3 the most senior? Is there like	09:34:02
17 that you're being designated on certain topics by	09:30:26	17 Principal Architect I? Principal Architect II?	09:34:08
18 Charter.	09:30:29	18 A. That's correct. In terms -- yes.	09:34:09
19 Do you know what those topics are?	09:30:29	19 There's one other position above, which is	09:34:12
20 MR. REISNER: Why don't you show the witness	09:30:48	20 Distinguished Architect, but, yes, there's Principal	09:34:15
21 the particular topic numbers instead of requiring the	09:30:49	21 Architect I, II, and III.	09:34:19
22 witness to remember.	09:30:52	22 Q. Okay. So I is less senior than II than III?	09:34:20
23 THE WITNESS: So I would say generally, no,	09:30:54	23 A. Correct.	09:34:23
24 I do not know what the topics are.	09:30:57	24 Q. What products do you directly work on?	09:34:26
25 ///	09:30:57	25 A. My role is the development of cable modems,	09:34:35
Page 19		Page 21	
1 BY MR. LENNING:	09:30:57	1 and some of the components around access architecture	09:34:46
2 Q. Okay. Okay. Let's go to the next exhibit.	09:30:59	2 that is the physical layer, design of the physical	09:34:51
3 Can we introduce Number 2.	09:31:15	3 layer between our infrastructure and copper	09:34:57
4 (Stafford Exhibit 2 was identified.)	09:31:29	4 infrastructure and customers' homes, known as access	09:35:00
5 MR. REISNER: Just let us know when it's up.	09:31:29	5 architecture.	09:35:04
6 MR. RICHEY: It's up.	09:31:30	6 And I work on -- on some tools around	09:35:05
7 BY MR. LENNING:	09:31:30	7 access architecture to assist our operations team.	09:35:12
8 Q. It should be up now. You might have to	09:31:35	8 Most of it is around technical design.	09:35:21
9 refresh.	09:31:36	9 Q. Does that describe the Network Technology	09:35:25
10 Oh, wait, no. No. I'm talking about the	09:31:46	10 Group generally, or are there other teams that are	09:35:28
11 LinkedIn profile. Sorry.	09:31:49	11 working on different things than what you just	09:35:31
12 MR. REISNER: Just so the record's clear, is	09:31:55	12 described?	09:35:33
13 Exhibit 2 being marked and put in the record or not?	09:31:57	13 A. There are certainly many teams covering	09:35:33
14 MR. LENNING: Oh, sure. We can, just so	09:32:00	14 different parts of the infrastructure, such as	09:35:36
15 it's in there. Exhibit 2 is the -- just the	09:32:01	15 optical, DOCSIS, wireless, different disciplines	09:35:38
16 amended -- it's already on there anyway. Is the	09:32:05	16 within those groups. There are many teams, yes.	09:35:46
17 amended 30(b)(1) notice for Mr. Stafford.	09:32:08	17 Q. Is that -- so my next question was going to	09:35:49
18 BY MR. LENNING:	09:32:08	18 be if you can describe the structure of that	09:35:52
19 Q. Have you seen that document?	09:32:12	19 department, the network technology. Is that what you	09:35:54
20 A. No, I've not.	09:32:13	20 just gave, basically those different groups you just	09:35:58
21 Q. Okay. You should be able to go now to	09:32:14	21 gave?	09:36:01
22 Exhibit 3 when it's loaded.	09:32:17	22 A. Uh-huh. Yes.	09:36:02
23 (Stafford Exhibit 3 was identified.)	09:32:35	23 Q. What is the group you're in called?	09:36:03
24 BY MR. LENNING:	09:32:35	24 A. I'm within what is just generally known as	09:36:04
25 Q. There we go. Let me know when you've got	09:32:35	25 Access Architecture.	09:36:07

6 (Pages 18 - 21)

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